

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANTON PURISIMA,

PLAINTIFF,

VS.

NEW YORK CITY TRANSIT AUTHORITY  
and or ("MaBSTOA"); CITY OF NEW YORK  
("CITY"); NEW YORK CITY ("MTA");  
"LATINA" DOG OWNER ("OWNER OF THE DOG");  
("THE 'INSTIGATORS'"); DOES 1 — 1000;  
AU BON PAIN STORE #000 723 and or ("LAGUARDIA AU BON PAIN 723");  
LAGUARDIA AIRPORT ADMINISTRATION and or ("LAGUARDIA AIRPORT");  
CAREPOINT HEALTH; HOBOKEN UNIVERSITY MEDICAL  
CENTER; K MART STORE 774 9; MD AMY CAGGIOLA;  
ST. LUKES EMERGENCY DEPT;

DEFENDANTS.

FIRST CAUSE OF ACTION —  
PERSONAL INJURY AGAINST  
ALL DEFENDANTS

1. DEFENDANT NEW YORK CITY  
TRANSIT AUTHORITY and or ("MaBSTOA")  
IS THE AGENCY and or DEPARTMENT OF THE  
CITY OF NEW YORK RESPONSIBLE (AS  
"MANAGER") OF MTA NEW YORK BUS Q32 BUS,  
WHERE THE ALLEGED ILLEGAL ACTS HAPPENED.

2. DEFENDANT CITY OF NEW YORK  
("CITY") — IS RESPONSIBLE (AS "OWNER") OF MTA NEW YORK CITY BUS Q32  
WHERE THE ALLEGED ACTS HAPPENED AS WELL AS DEFENDANT CITY OF  
NEW YORK ("CITY") AS OWNER OF Q32 MTA BUS ALLOWED THESE  
ILLEGAL ACTS TO HAPPEN INSIDE ITS MTA Q32 BUS WHEREIN THE  
ALLEGED DOG-BITE TO PLAINTIFF ANTON PURISIMA'S MIDDLE-RIGHT  
FINGER WAS CONDUCTED BY ITS PASSENGERS IN CONSPIRACY WITH ITS  
CODEFENDANTS HEREIN, PURSUANT TO INFORMATION AND BELIEF, THEREFORE

=PAGE ONE

14CV2755  
CASE #

VERIFIED  
COMPLAINT FOR:

1. PERSONAL INJURY
2. DISCRIMINATION
3. RETALIATION
4. HARASSMENT
5. INTENTIONAL TORT
6. FRAUD; ATTEMPTED MURDER;
7. INTENTIONAL  
INFLECTION OF  
EMOTIONAL DISTRESS;
8. CONSPIRACY TO DEFRAUD;
9. NATIONAL ORIGIN  
DISCRIMINATION;  
CORRUPT PRACTICES ACTS;
10. CIVIL RIGHTS ACT  
VIOLATIONS;
11. (PUBLIC "ACCOMMODATIONS")  
VIOLATIONS;
12. COVER-UP  
VIOLATIONS; ETC.;

DEMAND FOR JURY TRIAL

PLAINTIFF ALLEGES HEREIN.

3. DEFENDANT NEW YORK CITY ("MTA"), IS RESPONSIBLE AS (A "PLACE AND PROVIDER OF PUBLIC ACCOMMODATIONS") AS WELL AS IS RESPONSIBLE AS AN "AGENCY NAME" THAT MANAGES THE PLACE OF THE INCIDENT OF ITS BUS Q37 ROUTE MTA BUS WHERE THE INCIDENT OF "DOG BITE" TO PLAINTIFF'S MIDDLE RIGHT FINGER HAPPENED ON ITS Q32 BUS, IN CONSPIRACY WITH THE ALLEGED ACTS OF ITS CODEFENDANTS HEREIN. DEFENDANT NEW YORK CITY ("MTA") IS THEREFORE RESPONSIBLE THE SAME ACTS AS ITS CODEFENDANT # ONE (1) HEREIN, (AS "CONSPIRATOR AND INSTIGATOR") OF THESE ILLEGAL ACTS ON ITS Q32 BUS.

4. DEFENDANT "LATINA" DOG OWNER ("OWNER OF THE DOG"), IS RESPONSIBLE AS THE ALLEGED OWNER OF THE DOG THAT BIT PLAINTIFF'S MIDDLE-RIGHT-FINGER ON Q32 NEW YORK CITY MTA BUS ON OCTOBER 2013. DEFENDANT "LATINA" DOG OWNER ("OWNER OF THE DOG") AS OWNER OF THE ALLEGED DOG REFUSED TO PROVIDE INFORMATION ABOUT THE ALLEGED DOG THAT IS INFECTED WITH RUBIES PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN. ON OR ABOUT OCTOBER 2013, DEFENDANT ("OWNER OF THE DOG") IN CONSPIRACY OF HER ALLEGED ("PROTECTOR") and ("INSTIGATORS") CONDUCTED THE ACTS OF HER RUBIES INFECTED DOG TO BITE PLAINTIFF'S MIDDLE-RIGHT-FINGER THAT CAUSES "CUT and BLEEDING" OF PLAINTIFF'S MIDDLE RIGHT FINGER. AFTER THESE ACTS OF DOG-BITE THAT CAUSED BLEEDING BLOOD OF PLAINTIFF'S FINGER, DEFENDANTS HEREIN IN CONSPIRACY WITH THE ("RUBIES INFECTED DOG OWNER") REFUSED TO PROVIDE "THE INFORMATION TO PLAINTIFF" ABOUT HER DOG and EXITED THE ALLEGED Q32 MTA NYC BUS, AS INSTRUCTED BY HER (ALLEGED "HANDLERS") THAT WERE INSIDE THE ALLEGED <sup>BUS</sup> WITH HER, AND EXITED WITH HER AT 61<sup>ST</sup> STREET and ROOSEVELT AVENUE BUS STOP, THESE ACTS OF DEFENDANTS HEREIN, LEAVING PLAINTIFF WITHOUT THE INFORMATION CAUSED MORE PAIN AND SUFFERING IN ADDITION TO THE ALLEGED DOG-BITE. THESE ACTS OF DEFENDANTS HEREIN CONSTITUTED CAUSE OF ACTION ALLEGED ABOVE, THEREFORE, (CAUSED "PRICELESS DAMAGES")

=PAGE TWO

ACP TO PLAINTIFF HEREIN; THE ALLEGED "OWNER OF THE DOG" IS HEREBY SUED INDIVIDUALLY, HEREIN.  
 5. DEFENDANTS (THE "INSTIGATORS") and DOES 1—1000, WERE AND (ARE "CONSPIRATORS") AS WELL (AS "INSTIGATORS") OF THESE ACTS ALLEGED, THEREFORE, RESPONSIBLE TO ALL THESE ILLEGAL ACTS ALLEGED HEREIN. THESE WERE AND ARE UNNAMED DEFENDANTS HEREIN, FOR THESE, PLAINTIFF ANTON PURISIMA WILL AMEND THIS COMPLAINT IF THESE DEFENDANTS ARE KNOWN TO HIM AS THESE INDIVIDUALS WERE AND ARE RESPONSIBLE TO ALL CAUSE OF ACTION AND DAMAGES ALLEGED.

6. PLAINTIFF ANTON PURISIMA, IS (A "FILIPINO-AMERICAN") AS WELL AS (A "PASSENGER OF Q32 MTA BUS," OWNED BY AND OPERATED AND MANAGED BY DEFENDANTS ONE (1) — FIVE (5) (PARAGRAPHS)) HEREIN. PLAINTIFF ANTON PURISIMA'S RACE AND NATIONAL-ORIGIN AS A FILIPINO-AMERICAN WAS AND IS USED AS BASIS BY DEFENDANTS HEREIN IN ORDER TO DO THESE ILLEGAL ACTS ALLEGED ABOVE.

7. PLAINTIFF NOTIFIED PARTIES DEEMS RESPONSIBLE PRIOR TO FILING THIS ACTION, EXCEPT THOSE ISSUES THAT PROHIBITED HIM TO ACT. OTHERWISE, PLAINTIFF CONDUCTED ALL ACTS NEEDED IN HIS CASE PRIOR TO FILING THIS ACTION. PLAINTIFF ATTACHED HERewith TRUE COPIES OF THE FOLLOWING DOCUMENTS MARKED AS "EXHIBITS," IN ORDER TO INCORPORATE AND TO SUPPORT ALL CAUSE OF ACTION ALLEGED AND TO SUPPORT ALL HIS STATEMENTS, ARGUMENTS, CAUSE OF ACTION, AND DAMAGES ALLEGED IN THIS ACTION.

8. PLAINTIFF INCORPORATES ALL ATTACHMENTS, ALL EXHIBITS ATTACHED IN HIS "PERSONAL INJURY CLAIM FORM" Dated, notarized, and filed on JANUARY 08, 2014, WITH THE COMPTROLLER'S OFFICE, NYC.; AND TO SUPPORT THIS ACTION HEREIN, HEREBY INCORPORATES THE ABOVE DOCUMENT HEREIN AS WELL AS TO SUPPORT ALL CAUSE OF ACTION AND DAMAGES ALLEGED.

9. PLAINTIFF INCORPORATES THE LETTER DATED: FEB. 09, 2014 NOTARIZED ON: FEB. 10, 2014 and FILED ON: FEB. 12, 2014 and MAILED by and through CERTIFIED MAIL # 7013 2250 0001 5562 7541 ON: FEBRUARY 2014 (MAILED)



HEREIN, AND TO SUPPORT THEREOF.

10. PLAINTIFF INCORPORATES THE LETTER, DATED: MAR. 10, 2014, NOTARIZED ON: MAR. 10, 2014 and FILED ON: MAR. 10, 2014 WITH NYC COMPTROLLER'S OFFICE as well as MAILED by and through CERTIFIED MAIL # 7012 2970 0001 9727 7929, ON: MAR. 11, 2014, ADDRESSED TO: INVESTIGATION BUREAU; LAW DEPARTMENT, 10TH FLOOR, 130 LIVINGSTON STREET, BROOKLYN, NEW YORK 11201. AND TO SUPPORT THEREOF.

SECOND CAUSE OF ACTION —  
TO  
TWELVETH CAUSES OF ACTIONS  
AGAINST  
ALL DEFENDANTS

11. PLAINTIFF INCORPORATES ALL CAUSES OF ACTION ALLEGED ABOVE HEREIN and TO SUPPORT THEREOF.

12. PLAINTIFF INCORPORATES PARAGRAPHS 1 — 11 ABOVE.

14. ON OR ABOUT OCTOBER 09, 2013, GOING THROUGH EACH INCIDENT and OR ISSUE ALLEGED HEREIN and CONTINUING TO THE PRESENT TIME, DEFENDANTS HEREIN CONSPIRED THEIR ACTS AND BASIS THEIR CONSPIRACY AGAINST PLAINTIFF ANTON PURISIMA'S RACE, NATIONAL-ORIGIN as a FILIPINO-AMERICAN, PLAINTIFF'S MEDICAL DISABILITY AS WELL AS RETALIATION <sup>ACTS</sup> DUE TO "PRIOR FILINGS OF DISCRIMINATION CHARGES BY PLAINTIFF IN RELATED CASE # 09-CV-3502 (N66) (LB) (PURISIMA VS. TIFFANY ENTERTAINMENT, et. al.) and OTHER RELATED CASES HEREIN," AS WELL AS THEREIN IN EACH CASE AND OR DISCRIMINATION FILED AGAINST THESE DEFENDANTS AND THEIR CODEFENDANTS HEREIN. PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN AND THESE ACTS BY DEFENDANTS HEREIN IS CONTINUING THEREFORE, THE DAMAGES TO PLAINTIFF HEREIN IS CONTINUING AS WELL.

15. ON OR ABOUT OCTOBER 09, 2013, AND CONTINUING, DEFENDANTS HEREIN IN CONSPIRACY WITH THEIR CODEFENDANTS IN RELATED CASES THEREIN AS WELL AS INSTRUCTED BY (THEIR "INSTIGATORS") and at CODEFENDANTS HEREIN CONSPIRED THEIR ACTS TO INFLICT RETALIATION AGAINST PLAINTIFF ANTON PURISIMA FOR FILING DISCRIMINATION CASES OR CHARGES AGAINST (THESE "DEFENDANTS") IN THESE RELATED CASES ALLEGED. DEFENDANTS ACTS HEREIN WERE AND ARE BASED ON THE RACE and NATIONAL-ORIGIN OF PLAINTIFF AS FILIPINO-AMERICAN.

### ADDITIONAL DEFENDANTS

16. DEFENDANT AUBON PAIN STORE # 000 723 and/or ("LAGUARDIA AUBON PAIN 722 A"), IS RESPONSIBLE AS AN EMPLOYER OF ITS INDIVIDUAL EMPLOYEES IN THE ALLEGED STORE. (THE "ACTS") OF THESE ALLEGED AUBON PAIN EMPLOYEES WERE AND ARE IN CONSPIRACY WITH ACTS TO DEFRAUD PLAINTIFF ANTON PURISIMA HEREIN, (BY "KNOWINGLY OVER-CHARGING") PLAINTIFF OF HIS COFFEE, EVERY-TIME PLAINTIFF BUYS HIS ALLEGED COFFEE IN THAT ALLEGED AUBON PAIN STORE AT LA GUARDIA AIRPORT, NEW YORK. PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN, (THESE "ACTS") DID NOT HAPPEN TO OTHER PATRONS / OR OTHER PEOPLE BUT THESE REPEATED OVER-CHARGING - ACTS - TO - PLAINTIFF'S COFFEE, EVERY-TIME HE BUYS HIS COFFEE ("TWO-TIMES"), OR ("THREE-TIMES") OR MORE EXPENSIVE THAN OTHER PATRONS' COFFEE, COMPARED. PURSUANT TO INFORMATION AND BELIEF, THESE ACTS BY DEFENDANTS HEREIN WERE AND ARE DONE, DUE TO PLAINTIFF ANTON PURISIMA'S RACE and NATIONAL ORIGIN AS FILIPINO-AMERICAN, THESE ACTS BY DEFENDANTS HEREIN WERE CONDUCTED BECAUSE OF PLAINTIFF'S RACE AND NATIONAL ORIGIN

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AND DUE TO THESE ALLEGED EMPLOYEES OF DEFENDANT AUBON PAIN TOGETHER WITH OTHER EMPLOYEES AT LAGUARDIA AIRPORT WERE AND ARE CORRUPTED BY (THESE "CHINESE INDIVIDUALS") PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN BY (THESE "AGENTS") OF DEFENDANTS IN CASE # 09-CV-3502 (N66) (LB) (PURISIMA VS. TIFFANY ENTERTAINMENT, et. al.). THESE ACTS CONDUCTED BY THESE PERSONNEL AT LAGUARDIA AIRPORT AGAINST PLAINTIFF ANTON PURISIMA HEREIN WERE THE CONTINUING RETALIATION ACTS CONDUCTED BY DEFENDANTS IN ALLEGED RELATED <sup>CASE</sup> THROUGH (THEIR "AGENTS") WHO ACTED (AS "INSTIGATORS") OF THESE ACTS AGAINST PLAINTIFF HEREIN, THEREFORE, THESE DEFENDANTS IN PARAGRAPH # 16 and PARAGRAPH # 17 ALLEGED HEREIN WERE and ARE RESPONSIBLE OF ALL THESE ILLEGAL ACTS AND CAUSE OF ACTION ALLEGED.

17. DEFENDANT LAGUARDIA AIRPORT ADMINISTRATION ("LAGUARDIA AIRPORT") IS RESPONSIBLE AS ALLEGED ABOVE, THEREFORE, RESPONSIBLE TO ALL THESE ILLEGAL ACTS ALLEGED HEREIN and therefore responsible to all these damages alleged herein as well. Plaintiff incorporates all exhibits attached herewith and Cause of Action alleged herein and to support thereof. DEFENDANT HEREIN ("WAS AND IS USED" BY THEIR CODEFENDANTS) IN ALLEGED RELATED CASE TO RETALIATE AGAINST PLAINTIFF HEREIN TO DENY PLAINTIFF OF (SERVICES OF "PUBLIC ACCOMMODATIONS") EVEN WHEN THE ALLEGED PLACE (IS A PLACE AS WELL AS PROVIDER OF PUBLIC ACCOMMODATIONS PLAINTIFF HEREIN WAS AND IS DENIED, CORRUPTED, HARASSED,



RETALIATED AGAINST OF THESE PUBLIC ACCOMMODATIONS SERVICES ALLEGED ABOVE, DENIED OF SERVICES DUE TO HIM, REFUSED TO GET DRINKS THAT HE PAID FOR, OVER-CHARGED-KNOWINGLY-BY-EMPLOYEES AT LAGUARDIA AIRPORT, HARASSED REPEATEDLY, EVEN WHEN PLAINTIFF REPORTED THE ALLEGED INCIDENTS TO THE AUTHORITIES and THE ADMINISTRATION AT LAGUARDIA AIRPORT, PLAINTIFF HEREIN WAS AND IS DENIED OF SERVICES AND INVESTIGATION AS WELL AS PLAINTIFF HEREIN WAS AND IS INSULTED VERBALLY BY (THE "EMPLOYEES") AT LAGUARDIA AIRPORT. ON OR ABOUT MARCH 2014, PLAINTIFF WAS PLUGGING HIS ELECTRIC (SMALL-RICE-COOKER) OUT-SIDE-ELECTRIC-OUTLET (SAME PLACE WHERE PLAINTIFF CHARGED HIS CLOCK). PLAINTIFF HEREIN WAS STOPPED BY THE OPERATIONS' MANAGER (AIRPORT MANAGER OF LAGUARDIA) TOGETHER WITH HIS EMPLOYEES EMPLOYEES AND ASSISTANTS. ("I HAVE BEEN DOING THESE COOKING FOR MORE OR LESS ONE (1) YEAR, WHY ONLY STOP ME NOW?").

ADDITIONALLY, I WAS ALLOWED BY THE PORT AUTHORITY POLICE ("ALL OF THEM") because I provided my identification and showed them police the alleged rice cooker. That it was safe to cook-rice-on-the-rice-cooker (By just plugging it in "ANY" (the "electrical outlet" - inside or outside the building is SAFE) AS WELL (AS "EVERY RESTAURANT INSIDE THE ALLEGED AIRPORT THAT NEEDS RICE IN THEIR RESTAURANT, USED THE SAME RICE-COOKER, "These Restaurants even used 'BIG-RICE-COOKER." Pursuant to information and belief, therefore, plaintiff alleges herein, these Defendants' ACTS herein were and are corrupted and ("instigated") by the alleged "ACTS OF RETALIATION and CONSPIRACY" BY THESE ALLEGED "AGENTS" OF DEFENDANTS IN RELATED CASES PENDING IN U.S. D.C., EASTERN DISTRICT OF NEW YORK (EDNY) CASE# 09-CV-3502 (NGG) (LB) (PURISIMA VS. TIFFANY ENTERTAINMENT, et al.), SEVERAL CASES CONSOLIDATED INTO ONE ABOVE CASE, AS ORDERED, PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGED HEREIN. ADDITIONALLY, PLAINTIFF HEREIN INFORMED THE ALLEGED HONORABLE COURT THAT PLAINTIFF ANTON PURISIMA HEREIN WAS AND IS FOLLOWED

BY THESE ALLEGED "AGENTS" TO PLAINTIFF'S USUAL PLACES HE HANGS-OUT AND PLACES OF BUSINESSES HE GOES TO, LIKE COPY CENTERS, LIBRARIES, BUS STATIONS, CASINOS, TRAIN STATIONS as well as what BUS and/or Train Plaintiff was and is RIDING as well as places Plaintiff herein was and is RESTING, these (alleged "AGENTS") OF DEFENDANTS (FROM "THESE PENDING CASES" ALLEGED) KNOWS WHERE PLAINTIFF HEREIN GOES IN CERTAIN TIME and PLACE of any single DAY. Additionally, Plaintiff herein was watching these Chinese individuals (MAN OR A WOMAN, OR TOGETHER (man & woman) that I do not know these individuals were and are taking pictures of myself I could be walking on the street or sitting at Bus terminals (Bus stations), at Train waiting stations, or at Airport waiting area or food court area or T.V. area (waiting area) these Chinese individuals and or combination (Chinese or non-Chinese individuals) were and are taking picture of myself while I was at these alleged places of businesses. There were and are my own PERSONAL OBSERVATION as I was personally watching them actually taking pictures of myself REPEATEDLY while I was at these above places as well as pursuant to information and belief, therefore, Plaintiff alleges herein, THESE ALLEGED INDIVIDUALS ABOVE, TAKING PICTURES OF MYSELF WITHOUT MY PERMISSION, WERE and (ARE "AGENTS") OF THESE ALLEGED DEFENDANTS HEREIN AS WELL AS THEREIN FROM THESE PLAINTIFF'S PENDING CASES.

ON OR ABOUT OCTOBER 12, 2013, DURING PLAINTIFF'S MEDICAL SCHEDULED APPOINTMENT AT ST. LUKES EMERGENCY ROOM (E.R.) HOSPITAL, AS SCHEDULED IN FOR PLAINTIFF'S SECOND (2<sup>nd</sup>) RUBIES SHOT, PLAINTIFF WAS FOLLOWED FROM THE BUS - TO THE BUS STOP - and TO THE EMERGENCY ROOM ENTRANCE OF ST. LUKES E.R. HOSPITAL, A CHINESE COUPLE TAKING PICTURES OF PLAINTIFF BEFORE GOING INSIDE E.R. ROOM. PLAINTIFF DOES NOT KNOW THESE INDIVIDUALS AND DID NOT PERMIT THESE PEOPLE TO TAKE HIS PICTURES.



18. PURSUANT TO INFORMATION AND BELIEF DEFENDANTS  
 HEREIN ACTED IN CONSPIRACY TO VIOLATE PLAINTIFF'S  
 RIGHTS AS WELL AS DEFENDANTS' ACTS HEREIN WERE AND ARE  
 INTENDED TO RETALIATE AGAINST PLAINTIFF ANTON  
 PURISIMA FOR FILING DISCRIMINATION CHARGE AND OR FOR  
 FILING HIS PRIOR DISCRIMINATION CASES, Related cases  
 herein. Pursuant to information and belief, therefore,  
 Plaintiff alleges herein that Plaintiff's (information and  
 "as believed") these acts by Defendants herein were and are  
 conducted only against Plaintiff herein but these  
 Defendants were and are good to others who were  
 and are their own RACE, Pursuant to information  
 and belief therefore alleged herein by Plaintiff  
 Anton Purisima,

UPON PLAINTIFF'S INFORMATION AND BELIEF, (ALL "PATRONS")  
 WITH THE SAME RACES WITH THESE EMPLOYEES  
 AT LAGUARDIA AIRPORT, INCLUDING THOSE WHO  
 BASICALLY LIVED THERE and are not even "PATRON"  
 RECEIVE GOOD TREATMENTS and given "free fees"  
 and free stuff and were allowed to do  
 illegal things but Plaintiff herein and his race  
 were and are treated bad by Defendants herein.

PUNITIVE AND EXEMPLARY DAMAGES

19-A. DEFENDANTS' ACTS OF ALL <sup>ELIGIBILITIES</sup> ALLEGED HEREIN AND  
 THESE DEFENDANTS ACTED WITH MALICE, FRAUD, OR OPPRESSION  
 ENTITLING PLAINTIFF TO PUNITIVE DAMAGES AND EXEMPLARY DAMAGES.

20-A. DEFENDANTS' ACTED AND OR ("ACTS") OF FRAUD,  
 ATTEMPTED MURDER CORRUPTION, AND OTHER INTENTIONAL TORT ACTS,  
 DISCRIMINATION, RETALIATION,

AC 17. THE TRUE NAMES AND CAPACITIES SUED AS DOES ARE UNKNOWN TO PLAINTIFF BUT BELIEVED RESPONSIBLE FOR THE ACTS AND DAMAGES ALLEGED.

18. PLAINTIFF HAS PERFORMED ALL OBLIGATIONS TO DEFENDANTS EXCEPT THOSE OBLIGATIONS PLAINTIFF WAS PREVENTED OR EXCUSED FROM PERFORMING.

19. PLAINTIFF HAS FILED "PERSONAL INJURY CLAIM FORM," ON JANUARY 08, 2014 AS WELL AS FILED (A "BACK-UP") LETTERS TO SUPPORT THE ALLEGED "P.I. CLAIM FORM" ON FEBRUARY 09, 2014 and ON MARCH 10, 2014 PURSUANT TO SECTION 1212 OF THE PUBLIC AUTHORITIES LAW AND SECTION 50-C OF THE GENERAL MUNICIPAL LAW, THEREFORE, PLAINTIFF INCORPORATES THE ABOVE DOCUMENTS HEREIN AND TO SUPPORT THEREOF.

AC 20. JURISDICTION OF THIS COURT IS BASED ON VIOLATIONS OF PLAINTIFF'S RIGHTS PROTECTED BY UNITED STATES CONSTITUTION, VIOLATIONS OF PLAINTIFF ANTON PURISIMA'S RIGHTS PRESCRIBED UNDER TITLE II OF THE CIVIL RIGHTS ACT 42 U.S.C. SECTION 20009 et seq.; AND OR DEFENDANTS' ACTS HEREIN ARE IN VIOLATION OF THE "PUBLIC ACCOMMODATIONS" TITLE II OF THE CIVIL RIGHTS ACT OF 1964, WHEREIN THE LOCATIONS OF THE INCIDENTS ALLEGED HEREIN, THAT SAID LOCATION OWNED AND ADMINISTERED BY DEFENDANTS HEREIN, WHEREIN SUCH PLACE IS A "PLACE and PROVIDER" OF PUBLIC ACCOMMODATIONS, "PRESCRIBED UNDER TITLE II VIOLATIONS OF THE CIVIL RIGHTS ACT OF 1964, THAT THESE ACTS HEREIN BY THESE DEFENDANTS WERE AND ARE INSTIGATED BY THE ACTS OF DEFENDANTS IN RELATED CASES ALLEGED ABOVE, THEREFORE, ALL THESE ACTS BY DEFENDANTS HEREIN CONSTITUTED (AS "RETALIATION ACTS AGAINST PLAINTIFF HEREIN"), PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGED HEREIN. THAT THE ALLEGED

INCIDENT HAPPENED WHILE PLAINTIFF HEREIN WAS AND IS (A "PASSENGER") OF DEFENDANTS' MTA BUS Q 32, THEREFORE, UNDER "PUBLIC ACCOMMODATIONS," PRESCRIBED UNDER TITLE II OF THE CIVIL RIGHTS ACT OF 1964. AS RETALIATION UNDER TITLE II; VIOLATION UNDER TITLE VI:

THESE ACTS BY DEFENDANTS HEREIN VIOLATED PLAINTIFF'S RIGHTS GUARANTEED BY THE U.S. CONSTITUTION, PRESCRIBED UNDER 42 U.S.C. SECTION 2000A-2 AS WELL AS PLAINTIFF'S RIGHTS SECURED BY SECTION 2000A-1 WERE AND ARE VIOLATED BY DEFENDANTS' ACTS HEREIN.

PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN <sup>ADMITTED ACTS</sup> THESE ACTS BY DEFENDANTS HEREIN CONSTITUTED, AS WELL AS (THE "ACTS OF VIOLATIONS") TO EVERY CAUSE OF ACTION ALLEGED ABOVE AND DAMAGES

ALLEGED HEREIN. THEREFORE, (EVERY "MEANING AND APPLICABILITY") OF EACH CAUSE OF ACTION ALLEGED ABOVE IS TO INCORPORATE HEREIN, TO INCORPORATE and to support to every cause of <sup>ACTION</sup> alleged by PLAINTIFF ANTON PURISIMA HEREIN. THEREFORE, PLAINTIFF REQUESTS THIS HONORABLE COURT, "SUA SPONTE," TO CITE THE APPLICABLE CASE LAW HEREIN.

### STATEMENT OF FACTS

21. PLAINTIFF INCORPORATES PARAGRAPH 1-20 ABOVE.

22. PLAINTIFF INCORPORATES HIS "PERSONAL IN-JURY CLAIM FORM," FILED: JANUARY 08, 2014, and his TWO (2) LETTERS: DATED: FEB. 09, 2014 and DATED: MAR. 10, 2014, HEREIN AND TO SUPPORT THEREOF.

23. ON OR ABOUT OCTOBER 09, 2013, INSIDE MTA Q 32 BUS OF DEFENDANTS HEREIN, DEFENDANTS HEREIN CONSPIRED and RETALIATED AGAINST PLAINTIFF ANTON PURISIMA



FOR FILING DISCRIMINATION CASES, COMPLAINTS, AND OR FOR FILING  
 DISCRIMINATION CHARGE AGAINST DEFENDANTS IN HIS PRIOR  
 CASES ALLEGED, DEFENDANTS HEREIN USED THE ACTS  
 ALLEGED ABOVE TO VIOLATE OR VIOLATED PLAINTIFF'S  
 RIGHTS ALLEGED. DEFENDANTS' ACTS HEREIN (AS  
 "INSTIGATED") BY THE ACTS<sup>OF</sup> CONSPIRACY WITH THEIR CODEFENDANTS  
 IN RELATED CASES ALLEGED ABOVE CONSTITUTED PAIN  
 AND SUFFERING, LOST TIME, ATTEMPTED MURDER, FRAUD,  
 DISCRIMINATION, DISCRIMINATION TO NATIONAL ORIGIN, CONSPIRACY  
 TO DEFRAUD, RETALIATION, VIOLATIONS OF TITLE II OF CIVIL  
 RIGHTS ACT OF 1964, VIOLATION OF PLAINTIFF'S<sup>MEDICAL</sup> DISABILITY,  
 PERSONAL IN-JURY TO PLAINTIFF'S PERSON, HARASSMENT,  
 INTENTIONAL TORT, CORRUPT PRACTICES ACT, INTENTIONAL  
 INFLECTION OF EMOTIONAL DISTRESS, CIVIL RIGHTS ACT  
 VIOLATIONS, PUBLIC ACCOMMODATIONS VIOLATION, COVER-UP  
 VIOLATIONS, 440 CIVIL RIGHTS VIOLATIONS, THESE ACTS  
 BY DEFENDANTS WERE AND ARE CONSOLIDATED INTO  
 ALLEGED DOG-BITE WITH RABIES INFECTED DOG, IN  
 CONSPIRACY BY DEFENDANTS HEREIN TO TRAINED AND  
 ALLOWED THE RABIES INFECTED DOG TO BITE<sup>^</sup> PLAINTIFF'S  
MIDDLE RIGHT FINGER, INSIDE NYC, MTA Q 32 BUS, BY  
 (THESE "SKILLFUL ACTS") OF DEFENDANTS HEREIN,  
 PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF  
 ALLEGES HEREIN. DUE TO THESE ACTS BY DEFENDANTS  
 HEREIN AGAINST PLAINTIFF ANTON PURISIMA, CAUSED DAMAGES  
 TO PLAINTIFF'S RIGHTS THAT IS "PRICELESS," CANNOT BE  
 REPAIRED BY MONEY THEREFORE PRICELESS.

1. PLAINTIFF'S DAMAGES IN APPROXIMATE  
AMOUNT OF: TWO THOUSAND DECILLION DOLLARS.

## 2. PUNITIVE AND EXEMPLARY DAMAGES;

3. INJUNCTIVE RELIEF - TBA ;

4. COSTS OF SUIT INCLUDING ATTORNEYS

FEEs;

FEES;  
DEEMS PROPER.

5. SUCH OTHER RELIEF AS THE COURT

ACB DATED: APRIL 10, 2014.  
NEW YORK, NEW YORK.

RESPECTFULLY SUBMITTED,

Kitof. 1/2

ANTON PURISIMA,  
PLAINTIFF PRO SE  
390 9TH AVENUE,  
NEW YORK, NEW YORK 1000.  
E-MAIL:

ACP

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## DONATION

25. PLAINTIFF HEREBY DONATING FORTY-FIVE-PERCENT (45%) OF THE PROCEEDS OF HIS CASE HEREIN TO HIS COUNTRY, THE UNITED STATES OF AMERICA (U.S.A.), AS A GUARANTEE TO PROTECT THE FUNDAMENTAL RIGHTS OF ALL AMERICANS, AND IN ORDER TO STRENGTHEN AND EQUIP THE U.S. ARMED FORCES AS WELL AS FOR RESEARCH EXPENSES FOR U.S. MILITARY.

ACP  
DATED: APRIL 10, 2014  
NEW YORK, NEW YORK.

RESPECTFULLY SUBMITTED,

Anton C. Purisima  
ANTON PURISIMA,  
PLAINTIFF, PRO SE  
DONOR

## ATTACHED EXHIBITS TO INCORPORATE IN THIS ACTION

26. PLAINTIFF INCORPORATES THE ATTACHED EXHIBITS AND TO SUPPORT EVERY CAUSE OF ACTION ALLEGED HEREIN AND TO SUPPORT EVERY PAGE IN THIS ACTION, IN PLAINTIFF'S CASE.

ACP  
A. PICTURE OF THE WOUND OF THE ALLEGED DOG-BITE OF PLAINTIFF'S MIDDLE-RIGHT-FINGER. This picture was taken by cell-phone on OCTOBER 09, 2013, after the alleged dog-bite and was sent by E-MAIL TO PLAINTIFF'S E-MAIL @ acpurisima@HOTMAIL.COM. with document information of the alleged



DOG BITE INCIDENT ON OCTOBER 09, 2013.  
 MARKED AS EXHIBIT "ONE" other clearer picture attached  
 to "Personal Injury Claim form," filed on Jan. 08, 2013.

B. formerly lost letter, (I found it).

Letter dated: February 19, 2014 "notice to appear for  
 oral examination," from New York City Transit Authority,  
 LAW Department.

MARKED AS EXHIBIT "TWO."

C. Letter dated: March 10, 2014, "from Plaintiff

Anton Prizima.

MARKED AS EXHIBIT "THREE".

D. Personal Injury claim form, filed on  
 January 08, 2014, complete with attachments when  
 filed at well as mailed, but the "Law Department"  
 of NYC, MTA returned the alleged document without  
 the attachments. Plaintiff herein is hereby filing  
 this "Incomplete - Returned 'PERSONAL INJURY CLAIM FORM,'" as  
 exhibit in this action.

MARKED AS EXHIBIT "FOUR."

E. Letter, dated: February 09, 2014, from  
 Plaintiff Anton Prizima. "Response to Jan. 17, 2014 letter."  
 MARKED AS EXHIBIT "FIVE."

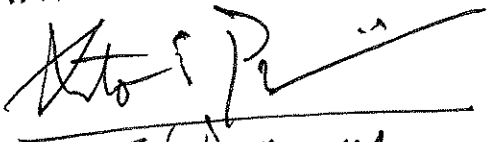
F. EMERGENCY ROOM, medical record of Plaintiff  
 (ROOSEVELT) ST. LUKE'S E.R. (Instructions after the E.R.  
 Visit at ST. Luke's) on OCTOBER 09, 2013 (DOG-BITE INCIDENT).  
 The alleged attachments documents to "Personal Injury Claim form,"  
 is hereby marked as EXHIBIT "SIX" HEREIN, FILED ON JAN. 08, 2014.

## VERIFICATION

THE MATTERS STATED IN VERIFIED COMPLAINT ARE TRUE EXCEPT THOSE MATTERS WHICH ARE STATED ON INFORMATION AND BELIEF AND AS TO THOSE MATTERS, I BELIEVED THEM TO BE TRUE.

I DECLARE UNDER PENALTY OF PER-JURY UNDER THE LAWS OF THE STATE OF NEW YORK THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS DECLARATION WAS EXECUTED ON MARCH 26, 2014, IN THE CITY OF NEW YORK, NEW YORK.

DATED: APRIL 10, 2014  
NEW YORK, NEW YORK.

BY:   
ANTON PURISIMA,  
PLAINTIFF, PRO SE

ACP

ACP

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ADDITIONAL PARTIES

27. DEFENDANT CARE POINT HEALTH, IS (THE "OWNER" and "ADMINISTRATOR") THAT MANAGES DEFENDANT HOBOKEN UNIVERSITY MEDICAL CENTER (HOBOKEN UMC). PURSUANT TO INFORMATION AND BELIEF, THEREFORE, PLAINTIFF ALLEGES HEREIN THAT DEFENDANT ("CARE POINT HEALTH") WAS AND IS A PARTY IN (ALL "THESE ACTS") BY DEFENDANTS HEREIN, PARTICIPATED THEREFORE IN EVERY CONSPIRACY TO THE ALLEGED "DOG-BITE-TO-PLAINTIFF'S - MIDDLE-RIGHT-FINGER-BY-RABIES-INFESTED-DOG," OWNED BY DEFENDANTS HEREIN BECAUSE (EACH "ACT" IS THE ACTS OF ALL DEFENDANTS HEREIN DUE TO (THESE "CONSPIRACY ACTS") BY DEFENDANTS IN THIS ACTION, THEREFORE, DEFENDANT CARE POINT HEALTH IS RESPONSIBLE TO ALL THESE CAUSE OF ACTION, AND DAMAGES ALLEGED.

28. DEFENDANT HOBOKEN UNIVERSITY MEDICAL CENTER, IS AN EMERGENCY ROOM ACTED AS (A "PLACE AND PROVIDER") OF PUBLIC ACCOMMODATIONS AS MEDICAL FACILITY THAT PLAINTIFF HEREIN SEEKED HELP FOR HIS PAINS IN HIS RIGHT ARM AND HIS BODY AS WELL AS HIS SWOLLEN RIGHT ELBOW AND SO MUCH PAIN AS WELL, DUE TO DOG-BITE ON OR ABOUT OCTOBER 09, 2013 "BY THE RABIES INFESTED DOG." DEFENDANT HOBOKEN UNIVERSITY MEDICAL CENTER AS WELL DID NOT ADDRESS THE MAIN ISSUES OR CONCERNS OF PLAINTIFF IN GOING TO DEFENDANTS' EMERGENCY ROOM (E.R.) <sup>OCT. 14, 2013</sup> THAT PLAINTIFF HEREIN WAS GIVEN TWO (2) SHOTS (TWO INJECTIONS) DURING HIS SCHEDULED APPOINTMENT ON OCTOBER 12, 2013 AT ST. LUKES EMERGENCY ROOM (HIS SECOND SHOT FOR RABIES TREATMENT). DEFENDANT ("HOBOKEN, UMC") HEREIN ACTED (AS "CORRUPTOR") and as well (AS "INSTIGATOR") OF THESE ILLEGAL ACTS CONDUCTED BY ITS EMPLOYEES THEREIN AGAINST PLAINTIFF ANTON PURISIMA, PURSUANT TO INFORMATION AND BELIEF, THEREFORE, PLAINTIFF ALLEGES HEREIN THESE ACTS BY DEFENDANTS HEREIN WERE AND (ARE "INSTIGATED") BY (THE "AGENTS") OF DEFENDANTS IN (RELATED "CASES") HEREIN, THEREFORE THESE DEFENDANTS FROM THESE ALLEGED RELATED



CASES INTO THIS ACTION. THEREFORE, DEFENDANT HOBOKEN UNIVERSITY MEDICAL CENTER (HOBOKEN "UMC") IS RESPONSIBLE IN THE ACTS OF CONSPIRACY, CORRUPTION, ATTEMPTED MURDER, (AND "OTHER ILLEGAL ACTS ALLEGED"), TOGETHER WITH ITS CODEFENDANTS HEREIN. THEREFORE, RESPONSIBLE TO ALL THESE CAUSE OF ACTION AND DAMAGES ALLEGED IN THIS CASE.

29. DEFENDANT KMART STORE 7749, IS A COMPANY STORE WHO SELLS KNOWINGLY DEFECTIVE PUSH-CART TO PLAINTIFF ANTON PURISIMA IN CONSPIRACY AS INSTIGATED BY THE ACTS OF "AGENTS" <sup>OF DEFENDANTS</sup> IN RELATED CASE #09-CV-3502 (N66)(LB) (PURISIMA VS. TIFFANY ENTERTAINMENT, et. al.) PENDING BEFORE THE U.S. DISTRICT COURT IN BROOKLYN, NEW YORK, PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN. (THESE "SELLING INCIDENTS") TO PLAINTIFF HEREIN IN CONSPIRACY BY (THE "ACTS") OF DEFENDANTS HEREIN IN THE FORM OF OR THROUGH ACTS OF RETALIATION and DISCRIMINATION AGAINST PLAINTIFF HEREIN BY AND THROUGH (THE "EMPLOYEES OF DEFENDANT KMART STORE 7749") AS INSTIGATED BY THE ALLEGED "AGENTS" OF DEFENDANTS IN THE ALLEGED RELATED CASE TO CONDUCT THESE ACTS OF RETALIATION, HARASSMENT, DISCRIMINATION TO NATIONAL ORIGIN OF PLAINTIFF AS FILIPINO-AMERICAN, PUBLIC ACCOMMODATIONS VIOLATION OF PLAINTIFF'S RIGHTS TO DEFENDANTS' PLACE and (at "a PROVIDER") OF PUBLIC ACCOMMODATIONS OBLIGATIONS TO PLAINTIFF BY DEFENDANTS HEREIN WERE AND ARE VIOLATED THROUGH CONSPIRACY AND RETALIATION ACTS INSTIGATED BY DEFENDANTS HEREIN AND THEIR CODEFENDANTS IN THE ALLEGED RELATED CASE ABOVE AGAINST PLAINTIFF ANTON PURISIMA HEREIN, PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN. FOR THESE REASON, DEFENDANT KMART STORE IS RESPONSIBLE TO ALL THESE ACTS ALLEGED, ALL CAUSE OF ACTION ALLEGED HEREIN, THEREFORE, RESPONSIBLE TO ALL DAMAGES ALLEGED BY PLAINTIFF IN THIS ACTION. ADDITIONALLY, (THESE "ACTS") OF DEFENDANTS HEREIN WERE AND ARE PART OF "GLOBAL CONSPIRACY") TO SELL KNOWINGLY DEFECTIVE PRODUCTS TO ALL AMERICANS and to EVERY COUNTRY AROUND THE WORLD THAT SUPPORTED AMERICAN INTEREST OR SUPPORTED THE U.S.A., IN ORDER TO

DAMAGE THESE COUNTRIES AND ITS PEOPLE, PURSUANT TO INFORMATION AND BELIEF THEREFORE ALLEGED HEREIN. THIS (ALLEGED "DEFECTIVE PUSH-CART") PRODUCT SOLD TO PLAINTIFF HEREIN (AND "REFUSED TO CHANGE OR REFUND") CONSTITUTED (AS "ACTS") OF FRAUD, CORRUPTION, CONSPIRACY AS WELL AS DEFENDANTS (HEREIN "USED THE RACE, and NATIONAL-ORIGIN" OF PLAINTIFF) HEREIN AS THEIR BASIS TO CONDUCT THESE ACTS OF DISCRIMINATION AGAINST PLAINTIFF ANTON PURISIMA IN DEFENDANTS' PLACE OF BUSINESS AS (A "PLACE AND PROVIDER") OF PUBLIC ACCOMMODATIONS UNDER TITLE II OF THE CIVIL RIGHTS ACT OF 1964 (THE "ACT"), WERE AND ARE VIOLATED BY THESE ALLEGED ACTS BY DEFENDANTS HEREIN. THIS ALLEGED INCIDENT WAS INITIALLY FILED AT "SMALL CLAIMS COURT," DURING PROCEEDING COURTDATED PLAINTIFF HEREIN ASKED AN ADJOURNMENT IN ORDER TO TRANSFER PLAINTIFF'S CLAIM TO THIS COURT AS (THE "ALLEGED INCIDENTS") AS WELL AS ACTS OF DEFENDANTS IN THESE INCIDENTS HEREIN WERE AND (ARE "INTERCONNECTED"), INSTIGATED BY THE "AGENTS" OF DEFENDANTS IN RELATED CASE #09-CV-3502 (NGG) (LB) (PURISIMA VS. TIFFANY ENTERTAINMENT, et. al.), PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGED HEREIN. THE ACTS OF THESE DEFENDANTS' IN ADDITION TO THE ABOVE AND AS PART OF (THEIR "ACTS OF RETALIATION AND CONSPIRACY TO DAMAGE PLAINTIFF ANTON PURISIMA HEREIN"), DUE TO THESE INCIDENTS THAT KEPT HAPPENING THESE CONTINUING ACTS OF RETALIATION CONDUCTED BY DEFENDANTS HEREIN AGAINST PLAINTIFF ANTON PURISIMA AS ALLEGED ABOVE AND PURSUANT TO INFORMATION AND BELIEF THEREFORE, PLAINTIFF ALLEGES HEREIN. DUE TO TIME LIMITATIONS AS WELL AS (THE "STATUTES OF LIMITATIONS") OF THESE INCIDENTS ALLEGED, PLAINTIFF HEREIN IS COMPELLED TO STOP IN THIS ISSUE ("IN ORDER") TO FILE THIS COMPLAINT, BUT PLAINTIFF HEREIN WILL FILE AN "AMENDED COMPLAINT" HEREIN BY THE TIME HE GATHERED ALL FACTS AND EVIDENCE IN THIS ACTION.

EXHIBIT "FOUR"  
for: "P. I. Claim form"  
§

EXHIBIT "ONE"  
for: COMPLAINT

\* Email Communication  
w/ Two (2) Pictures  
(one is picture of the dog - bite -  
wound, and sheet information  
about the incident  
on 10/09/2013).

ACP  
Please note: Plaintiff herein incorporates this  
exhibit to every page of this  
complaint.

ACP



At

New Reply Delete

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Categories

## Folders

Inbox 9106

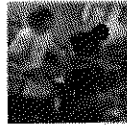
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Drafts 52

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# EXHIBIT "TWO"

ACV

\* Letter from :  
New York City Transit Authority  
Law Department  
dated: Feb. 19, 2014

\* To incorporate herein.